

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

UNITED STATES OF AMERICA ) CR. NO. 7:25-437  
)  
) 18 U.S.C. § 498  
vs. ) 18 U.S.C. § 492  
) 18 U.S.C. § 2252A(a)(5)(B)  
) 18 U.S.C. § 2252A(b)(2)  
) 18 U.S.C. § 2253  
) 28 U.S.C. § 2461(c)  
WILLIAM STEVEN WOOTEN )  
) INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

On or about the spring of 2022, in the District of South Carolina, the Defendant, WILLIAM STEVEN WOOTEN, did knowingly possess a certificate of discharge (FORM DD- 214) from a military service of the United States, that had been forged, counterfeited, or falsely altered, all in violation of 18 U.S.C. § 498.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

On or about May 2023, in the District of South Carolina and elsewhere, the Defendant, WILLIAM STEVEN WOOTEN, did knowingly possess material that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor, and which had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and which were produced using materials that had been mailed and shipped and transported in interstate and foreign commerce by any means,

including by computer, in that he did possess an iPhone on which were stored visual depictions of persons under the age of eighteen engaging in sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2).

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

**FORFEITURE****COUNTERFEITING:**

Upon conviction for violation of Title 18, United States Code, Section 498 as charged in this Indictment, the Defendant, WILLIAM STEVEN WOOTEN, shall forfeit to the United States any property used or intended to be used, in any manner or part, to commit or facilitate the commission of the offense.

**SEXUAL EXPLOITATION OF CHILDREN:**

Upon conviction for violation of Title 18, United States Code, Section 2252A as charged in this Indictment, the Defendant, WILLIAM STEVEN WOOTEN, shall forfeit to the United States his interest in:

- (i) any visual depiction described in section 2251, 2251A, 2252 or 2252A of chapter 110 of the United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of chapter 110 of the United States Code;
- (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and,
- (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

**PROPERTY:**

Pursuant to Title 18, United States Code, Sections 492 and 2253, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the offenses charged in this Indictment includes, but is not limited to, the following:

A. Cellular Phone:

iPhone XS, Model:WI A1920, in a black and silver case  
Serial Number: GONY535WKPFT  
IMEI: 357208098096496

B. Proceeds/Forfeiture Judgment:

A sum of money equal to all proceeds the Defendant obtained, directly or indirectly, from the offenses charged in this Indictment, and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to his violation of Title 18.

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant-

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third person;
- c. Has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28 United States Code, Section 2461(c), to seek forfeiture of any other property of the Defendants up to the value of the forfeitable property.

Pursuant to Title 18, United States Code, Sections 492 and 2253, and Title 28, United States Code, Section 2461(c).

A TRUE Bill  
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FOREPERSON

BROOK B. ANDREWS  
ACTING UNITED STATES ATTORNEY

By: William J. Watkins, Jr.  
William J. Watkins, Jr. (Fed. ID # 07863)  
Assistant United States Attorney  
55 Beattie Place, Suite 700  
Greenville, SC 29601  
Tel.: 864-282-2100  
Fax: 864-233-3158  
Email: bill.watkins@usdoj.gov